

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**CLAUDE LEWIS,**

**Plaintiff,**

**Civ. No.: 14-CV-2302 (CRK)(KNF)**

**- v. -**

**AMERICAN SUGAR REFINING, INC.,  
and MEHANDRA RAMPHAL,**

**Defendants.**

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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law in Support, and all the pleadings and proceedings heretofore had herein, the plaintiff, Claude Lewis, by his attorneys, Nesenoff & Miltenberg, LLP and Charny & Wheeler, will move this Court, before the Honorable Claire R. Kelly, United States District Judge, for the Southern District of New York at the U.S. Court of International Trade located at One Federal Plaza, Courtroom 1, New York, New York 10278, on such date as is convenient for the Court, for an Order:

- (i) Precluding Defendants from introducing any purported evidence and/or testimony regarding allegations of domestic violence and/or abuse lodged against Plaintiff which never resulted in an arrest or conviction; and
- (ii) Granting Plaintiff such other and further relief as the Court deems just and proper.

Dated: New York, New York  
February 12, 2018

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